

IN THE UNITED STATES DISTRICT COURT  
OF NEW MEXICO

Barbara Andersen

Plaintiff

v.

Forrest Fenn; Unknown Defendant

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Case 20-cv- 00553-JFR

**REPLY IN FURTHER SUPPORT OF MOTION TO COMPEL OR, ALTERNATIVELY,  
CONTEMPT AGAINST THE ESTATE OF FORREST FENN**

Barbara Andersen, as her own attorney, hereby replies to the response brief filed by the Estate of Fenn:

1. Karl Sommer offers yet another unverified pleading by Zoe Olds after putting on a media circus in conjunction with Jack Stuef.

2. Despite the recent national media circus that Karl Sommer appears to have orchestrated, Karl Sommer continues to pretend that he does not have the address and/or phone number of the person purportedly in possession of the treasure chest... who just so happens to be a spoof writer and appears to be working for New Mexico tourism.

3. Karl Sommer also speciously asserts to this Court that he was not required by this Court's order to (a) search the records of Forrest Fenn and/or (b) offer a verified response to the subpoena. Of course the land line records (if Zoe Fenn did not delete same as Forrest's website was deleted or the Fenn blogs were deleted) would show the phone number of Jack Stuef... that is if he truly found the treasure and/or called Forrest Fenn in June 2020.

4. The Estate's attorney also does not explain why it would not possess the address information of Jack Stuef. Why would the Estate not possess such information? Did they agree with Stuef to defraud the IRS and not report the treasure for tax purposes? Shouldn't the Estate have the address and social security number of Jack Stuef for tax reporting purposes by year end 2020 (i.e. tomorrow)? Indeed, given that Jack Stuef and Shiloh Olds (Zoe's son) have obviously

been speaking with each other relative to their recent December 2020 national press releases, is the Estate seriously saying that they could not have secured same in the course of those December 2020 phone calls?

5. And, is Karl Sommer seriously suggesting that he did not speak with Stuef's counsel? Clearly, as the authorized representative/attorney of the Estate, Karl Sommer could have asked for the address and phone number of Jack Stuef in their calls or via e-mail so as to comply with this Court's simple order on the subject?

6. The Estate's attorney has been stalling Andersen with nonsense since June 2020. There is no serious question that the solve is in New Mexico and that Andersen solved same. The only communications with Karl Sommer have been smug and dilatory. He appears to be directed to stall Andersen with nonsense.

7. It is irrelevant that Stuef's attorney has agreed to accept service; the Estate was ordered to produce the information which was clearly in the possession of Forrest Fenn... and thus Zoe Olds. They did not do so and give more nonsense justifications

8. Andersen considered filing a fraud claim against the Estate after the nonsense media circus by Shiloh Olds; specious pleadings such as today's filings by the Estate and the absurd press release of Shiloh Olds are not helping the Estate relative to Andersen and/or those who purchased Fenn's books. In addition, spoilation concerns are also continuing to grow. Andersen certainly hopes and trusts that Mr. Sommer had no role in the destruction of Dal Neitzel's website on Christmas Day.

9. Despite Mr. Sommer's newest "diatribe", he offers no good faith, verified excuse for not complying with a very simple order of this Court. Andersen requests that this Court order a verified response directly from Zoe Olds as to why she does not have the contact information of

Jack Stuef in the records of Forrest Fenn/the Estate. Further, in light of the growing spoilation of evidence concerns, Andersen requests that this Court order both Mr, Sommer and Zoe Olds to provide an affidavit as to the status of Forrest Fenn's records and their efforts to preserve same.

10. It is time for the Fenn family to be put under oath and stop hiding behind counsel and spoof Onion writers.

Wherefore, Andersen respectfully requests that this Court enforce its order and direct the Estate of Fenn to explain, under oath, why they do not have the contact information of Stuef , the status of Fenn's records, and their efforts to preserve Fenn's records.

Respectfully submitted:

/s/ Barbara Andersen

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**CERTIFICATE OF SERVICE**

Barbara Andersen hereby certifies that on December 30, 2020 the **REPLY BRIEF IN SUPPORT OF MOTION TO COMPEL** was filed and delivered via the ECF filing system to:

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